

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACQUELINE RAMOS and EDWIN)
JOHNSON, individually and on behalf of all)
others similarly situated,)
Plaintiffs-Movants,) Civil No. 2:24-mc-00026-CMR
VANESSA TWYMAN,)
Movant,)
v.)
WALMART INC.)
Defendant-Respondent.)

**JOINT STIPULATION AND ORDER REGARDING TRANSFER OF
MOTION TO QUASH SUBPOENA TO ISSUING COURT**

1. **WHEREAS**, this miscellaneous action concerns a Motion to Quash a subpoena issued by the District Court for the District of New Jersey, in the action styled *Ramos v. Walmart Inc.*, Case No. 2:21-cv-13827-BRM-AME. *Ramos* is a putative class action in the District of New Jersey in which Plaintiffs assert hiring discrimination claims against Walmart under Title VII and state laws;
2. **WHEREAS**, in *Ramos*, Walmart served on Movant Vanessa Twyman, Plaintiff Edwin Johnson's wife, a subpoena to appear for deposition in the Eastern District of Pennsylvania ("Twyman Subpoena");
3. **WHEREAS**, on May 9, 2024, Johnson and Twyman timely filed their Motion to Quash the Twyman Subpoena in this Court, as it is the Court where compliance is required. *See* Fed. R. Civ. P. 45(d)(3)(A);

4. **WHEREAS**, *Ramos* is pending before District Judge Brian Martinotti and Magistrate Judge Andre Espinosa, who have appointed District Judge Freda Wolfson (Ret.) as special master to address discovery disputes arising in the action. Through her service as special master, Judge Wolfson has developed deep familiarity with the facts and procedural background of *Ramos*. Judge Martinotti and Magistrate Judge Espinosa, likewise, have significant familiarity with the facts and history of *Ramos*;

5. **WHEREAS**, both Johnson and Twyman are represented for purposes of the Motion to Quash by Plaintiffs' counsel in *Ramos*; and

6. **WHEREAS**, Johnson, Twyman and Walmart agree that in the interests of efficiency and consistency, the Court should transfer this miscellaneous action and the pending Motion to Quash to the District Court for the District of New Jersey under Federal Rule of Civil Procedure 45(f) ("When the court where compliance is required did not issue the subpoena, it may transfer a motion under this rule to the issuing court if the person subject to the subpoena consents or if the court finds exceptional circumstances.") so that this dispute can be heard by the presiding judges in *Ramos*,

7. **THEREFORE, IT IS** on this ___ day of May, 2024, **ORDERED**, that pursuant to Federal Rule of Civil Procedure 45(f), this miscellaneous action and the pending Motion to Quash are transferred to the District Court for the District of New Jersey, where the parties will seek to have this dispute heard by the *Ramos* court.

IT IS SO ORDERED:

Cynthia M. Rufe, J.

Dated: May 16, 2024

Respectfully submitted:

/s/ Deirdre Aaron

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CERTIFICATE OF SERVICE

I, Thomas R. Waskom, hereby certify that on May 16, 2024, I caused a true and correct copy of the foregoing Joint Stipulation and Order Regarding Transfer of Motion to Quash Subpoena to Issuing Court to be served via CM/ECF filing upon counsel for all parties.

/s/ Thomas R. Waskom
Thomas R. Waskom